

**DIVISION OF OCCUPATIONAL SAFETY AND HEALTH  
POLICY AND PROCEDURES MANUAL**

**GUIDANCE ON  
FEASIBILITY OF  
ENGINEERING  
CONTROLS FOR THE  
REINFORCED PLASTICS  
INDUSTRY**

P&P C-39

Issue Date:

1/15/91

Revised: 8/1/94

**AUTHORITY:** Title 8 California Code of Regulations §5155.

**POLICY:** It is the policy of the Division of Occupational Safety and Health to allow manufacturers in the reinforced plastics industry to utilize a combination of protective measures to meet the permissible exposure limit (PEL) for styrene.

**PROCEDURES:**

**A. AIR SAMPLING**

1. When conducting air sampling for styrene in hand layup and sprayup operations at a workplace in the reinforced plastics industry, compliance personnel shall note whether the measurement exceeds the PEL for styrene of 50 ppm (250 mg/M<sup>3</sup>).
2. If the air sampling level result exceeds the PEL, compliance personnel shall determine if the item involved in the hand layup or sprayup operation is:
  - a. More than 250 ft<sup>2</sup> in surface area;
  - b. More than 150 ft<sup>3</sup> in volume; or
  - c. More than 30 feet in length.

**B. CITATION**

If one or more of the conditions referenced in Section A.2a. through c. exists, and the employer is utilizing a mix of engineering controls, work practice and personal respiratory protection to achieve compliance with the PEL,

compliance personnel shall not cite the employer for a violation of 8 CCR §5155, §5141(a) or (b), unless compliance personnel can document that compliance is feasible solely with engineering and work practice controls.